

Jun 10, 2022

s/ D. Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

District of \_\_\_\_\_

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Case No. 22 MJ 93

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

located in the \_\_\_\_\_ District of \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☐ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

The application is based on these facts:

- ☐ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Mario Lantigua

Applicant's signature

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
 telephone \_\_\_\_\_ (specify reliable electronic means).

Date: 6/10/2022

William E. Duffin

Judge's signature

City and state: \_\_\_\_\_

Printed name and title

## **AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Mario Lantigua, having been duly sworn, do hereby depose and state:

### **INTRODUCTION AND AGENT BACKGROUND**

1. I am a United States Postal Inspector, assigned to the United States Postal Inspection Service (“USPIS”) Domicile in Milwaukee, Wisconsin. I have been a law enforcement officer for over five years. From October 2008 to May 2011, I served as a Border Patrol Agent with the Department of Homeland Security in Laredo, Texas. I served as a Federal Police Officer with the West Palm Beach Veterans Affairs Medical Center Police Department from May 2011 to February 2014. I have served as a Postal Inspector with the USPIS since August 2021.

2. The USPIS is the primary investigative arm of the United States Postal Service (“USPS”) and is charged under Title 18, United States Code, 3061 with the enforcement of laws governing the use and movement of the United States Mail, including the misuse and fraudulent schemes involving the mail, crimes relating to mail fraud, narcotics trafficking and identity theft involving the United States Mail.

3. In 2015, I graduated from Mount St. Mary’s University with a Bachelor’s degree in Business Administration.

4. I have assisted in numerous drug investigations in my five years of law enforcement experience and received continual training in that and other fields. Through training, experience, and discussions with fellow United States Postal Inspectors, I am familiar with various methods of smuggling and trafficking narcotics and other controlled substances and the proceeds from sale of such substances. I am also familiar with methods used to evade detection of both the controlled substances and the proceeds from their sale that are used by drug traffickers. Within the USPIS, a primary investigative assignment of mine is the Prohibited Mail-Narcotics program, which is

responsible for protecting the United States Mail from misuse by traffickers and smugglers of illicit controlled substances. Also, within this program area is an effort to stop the misuse of the United States Mail by said drug traffickers, by seizing the proceeds of this unlawful activity as the proceeds are mailed back to the sources of supply.

5. During my time as a federal law enforcement, I completed numerous hours of training on criminal drug use, abuse, and trafficking. I have had both formal training and have participated in drug investigations. More specifically, my training and experience includes the following:

- a. I am familiar with the appearance and street names of various drugs, including marijuana, heroin, cocaine, cocaine base (unless otherwise noted, all references to crack cocaine in this affidavit is cocaine base in the form of crack cocaine), ecstasy, and methamphetamine. I am familiar with the methods used by drug dealers to package and prepare controlled substances for sale. I know the street values of different quantities of the various controlled substances;
- b. I am familiar with the language utilized over the telephone to discuss drug trafficking, and know that the language is often limited, guarded, and coded;
- c. I know that drug traffickers often use electronic equipment and wireless and land line telephones to conduct drug trafficking operations;
- d. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such;
- e. I know that drug traffickers often put their telephones in nominee names in order to distance themselves from telephones that are utilized to facilitate drug trafficking; and
- f. I know that drug traffickers often use drug proceeds to purchase assets such as vehicles, property, and jewelry. I also know that drug traffickers often use nominees to purchase and/or title these assets in order to avoid scrutiny from law enforcement officials.

6. Based on my training, experience, and discussions with fellow United State Postal Inspectors and North Central (formerly Wisconsin) High Intensity Drug Trafficking Area-HIDTA drug task force officers, I know narcotics, drugs, paraphernalia, controlled substances, and moneys associated with the sale of narcotics, drugs, and controlled substances are sent through the USPS

system, and I am familiar with many of the methods used by individuals who attempt to use the USPS to illegally distribute controlled substances.

#### **PURPOSE OF AFFIDAVIT**

7. This affidavit is made in support of a Federal Search and Seizure Warrant for the **SUBJECT PARCEL** (described below), for items which may constitute the fruits, instrumentalities, proceeds and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance), 846 (Conspiracy to Distribution and Possession with Intent to Distribute a Controlled Substance, and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance). To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed.

#### **PARCEL TO BE SEARCHED**

8. This affidavit is made in support of an application for a Federal Search and Seizure Warrant for a United States Priority Mail Express piece (**SUBJECT PARCEL**). The **SUBJECT PARCEL** is described as a white in color, envelope, weighing approximately 10.50 ounces gross total weight, bearing USPS Priority Mail Express tracking number EI 135 491 912 US. The parcel bears a handwritten label addressed from “Jennifer Whitson, 4203 W. Topeka Dr, Glendale, AZ,

85300". The handwritten label is addressed to "Matthew Tryon, 1694 S. Carriage Ln #A, New Berlin, WI 53151". The Postage paid was \$27.50.

### **INVESTIGATION OF THE SUBJECT PARCEL**

9. I, and other Postal Inspectors, have identified a trend of drug traffickers mailing controlled substances into the Eastern District of Wisconsin, from states in the Western United States, the Caribbean, and along the international border such as: Washington, Oregon, California, Colorado, Nevada, New Mexico, Texas, Arizona, and the territorial island of Puerto Rico. There, controlled substances are more easily and readily available, due to certain state laws, and a porous international border, among other reasons. Inasmuch as individuals who would receive these controlled substances through the United States Mail are obliged to pay for said controlled substances, often, the United States Mail is utilized by drug recipients to send payments back to the drug traffickers on West Coast, along the Southwestern United States and Puerto Rico. As such, within the Prohibited Mail-Narcotics program area of the USPIS, certain indicators have been identified in the area of the trafficking of both illegal drugs, and their proceeds, through the United States Mail.

10. I, along with other Milwaukee Postal Inspectors, conduct routine examinations of Postal Service databases and the outside of parcels traveling in the USPS Priority Mail and Priority Mail Express to the Eastern District of Wisconsin from states in the Southwest and Western United States as well as the territory of Puerto Rico.

11. On Thursday, June 9, 2022, the **SUBJECT PARCEL** arrived at the Milwaukee Processing and Distribution Center in Milwaukee, WI. Internal United States Postal Service databases revealed that the address of 1694 S. Carriage Ln #A, New Berlin, WI 53151 has received nine (9) Priority Mail Express parcels and one (1) Priority Mail parcel from Peoria, Arizona and

Sun City, Arizona between January 2022 and June 2022. Visual inspection of the **SUBJECT PARCEL** was indicative of drugs trafficked through the United States Mail from Arizona into the interior of the United States.

12. Examination of the exterior of the envelope revealed the parcel was addressed in a handwritten manner. I immediately noticed tell-tale signs of Postal based drug trafficking based on my training, experience and discussions with fellow United States Postal Inspectors. The envelope was heavily taped, which is a technique drug traffickers use in attempt to evade K9 detection. The postage label confirmed the mailer spent \$27.50 at a Post Office in Peoria, Arizona. The parcel was specifically addressed in the following manner:

From: Jennifer Whitson  
4203 W. Topeka Dr  
Glendale, AZ, 85300

To: Matthew Tryon  
1694 S. Carriage Ln #A  
New Berlin, WI 53151

13. The **SUBJECT PARCEL** had no phone number listed for either the sender or receiver, though it is a clearly marked option to do so. An option of a signature required upon receipt was not used by the sender. These are strong indicators of drug trafficking behavior of the **SUBJECT PARCEL**, which I am aware of based on my training, experience and discussion with fellow United States Postal Inspectors. The fee-free signature delivery confirmation of the intended recipient was not requested for the **SUBJECT PARCEL**. The use of “Waiver of Signature” for Priority Mail Express parcels is a common practice identified by the USPIS in the trafficking of illegal drugs and currency through the United States Mail as it is used to subvert law enforcement attempts for a controlled delivery of said parcels.

**CLEAR database query and K9 alert to the SUBJECT PARCEL**

14. United States Postal Service database searched revealed that the address of 1694 S. Carriage Ln #A, New Berlin, WI 53151 has received six (6) parcels from zip code 85381 and four (4) parcels from zip code 85351 between January 2022 and June 2022. Thomson-Reuters CLEAR database confirms Matthew Tryon to reside at that address. Thomason-Reuters CLEAN database indicated Jennifer Whitson was associated with 4203 W. Topeka Dr, Glendale, AZ back in 2013 but the Whitson's current Arizona driver license indicates she lives at 8347 W Bluefield Ave, Peoria, AZ 85382.

15. Based upon my training, experience, and discussion with fellow United States Postal Inspectors regarding the investigation of smuggling, trafficking and distribution of controlled substances, entering the Eastern District of Wisconsin through the U.S. Mail, I believe the **SUBJECT PARCEL** likely contains controlled substances being trafficked through the United States Mail. I then moved forward with a noninvasive law enforcement technique which would assist to confirm or refute my suspicions.

16. The United States Postal Inspection Service is a member agency of the North Central (formerly Wisconsin) High Intensity Drug Trafficking Area-HIDTA, a multi-agency antidrug task force, organized under the Office of the National Drug Control Policy. Waukesha County Deputy Patrick Maylen, a certified narcotics canine (K-9) handler, was contacted for assistance in conducting a canine sniff of the air near the **SUBJECT PARCEL**. On June 9, 2022, I met with Detective John Kopatich and Deputy Maylen and his canine Jackson. Deputy Maylen and K9 Jackson are a certified dual purpose Police Narcotic Detection Team, accredited through the American Police Canine Association (APCA) as well as through Jessiffany Canine Services, LLC in the detection of heroin, cocaine, marijuana, methamphetamine, MDMA, and other

controlled substances made with like components. This certification was obtained April 9th, 2022. Deputy Maylen is a current member of the Wisconsin Canine Handler Association as well as the American Police Canine Association, as required by the State of Wisconsin Controlled Substances Board. Deputy Maylen stated that over one hundred times during training and on the job, K9 Jackson has alerted to the presence of controlled substances he is trained to detect.

17. On June 9, 2022, the **SUBJECT PARCEL** was placed among multiple empty boxes in a hallway at the Waukesha County Metro Drug Unit building in Waukesha, WI. Deputy Maylen, Detective Kopatich and I watched as Jackson ceased all movement, sat and stared at the **SUBJECT PARCEL**. Deputy Maylen advised me that these actions are consistent with Jackson detecting the odor of controlled substances.

18. Based upon the information as outlined in this affidavit, I respectfully believe that the **SUBJECT PARCEL** may contain controlled substances being trafficked through the United States Mail. Consequently, I respectfully request authorization to open the **SUBJECT PARCEL** and search its contents for evidence of controlled substance trafficking. I also request permission to seize contents of the parcel as evidence, that may constitute contraband, proceeds or fruits of the crime of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance), 846 (Conspiracy to Distribution and Possession with Intent to Distribute a Controlled Substance, and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

19. I have not included in this affidavit each and every fact known to me regarding this investigation and search warrant application request; the facts included are only those that I, respectfully, believe may relate to a determination of whether there is probable cause to believe



that items sought to be seized will be found in the place, or item, to be searched, and whether those items are evidence of the offenses identified in this affidavit.

20. The **SUBJECT PARCEL** is currently being held at the United States Postal Inspection Service office in Milwaukee, Wisconsin.